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September 27, 2019

VIA ECF

Hon. Stewart Aaron
United States District Court
Southern District of New York
New York, NY 10007

Re: *Carlos Alvarado, et al. v. New Rams Deli Plus Inc. et al*
Index No. 18-cv-8650 (RA) (SDA)

Dear Judge Aaron:

We represent Plaintiffs Juan Carlos Alvarado and Alberto Tetlamatzi in the above-referenced matter. We submit this status report jointly with Defendants, pursuant to the Court's September 10, 2019 order. As set out below we respectfully request an extension of the deadline to complete discovery.

The parties have engaged in paper discovery. They initially exchanged documents in connection with informal disclosures, and Plaintiff has responded to interrogatories and document requests served by Defendants. The parties do not have any current or anticipated discovery disputes.

The parties do respectfully request an extension of the deadline to complete depositions and all fact discovery, from November 4, 2019 to December 2, 2019. This request is a result of counsels' respective schedules over the next month, which would present significant difficulties in scheduling depositions before November 4, 2019. This is the first request for an extension of the discovery deadline.

We thank the Court for its attention to this matter.

September 27, 2019

Page 2

Respectfully Submitted,

/s/ Joshua S. Androphy

Joshua S. Androphy